



**United States District Court
Southern District of New York**

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (RCC)

ECF Case

Case Management Order #2

This document relates to: All actions

Richard Conway Casey, United States District Court Judge:

If this Court so directs, Plaintiffs consent to proceed before a United States Magistrate for pre-trial purposes, pursuant to 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73.

Yes _____ X _____

No _____

Counsel for the parties have discussed the merits of settlement in regard to this action and wish to request a settlement conference before a United States Magistrate.

Yes _____

No _____ X _____

Counsel for the parties have discussed the merits of mediation in regard to this action and wish to employ the mediation services provided by this Court.

Yes _____

No _____ X _____

Consolidation

1. The actions listed in Schedule A have been transferred to this Court pursuant to 28 U.S.C. § 1407 for coordinated or consolidated pretrial purposes by the Judicial Panel on Multidistrict Litigation. All such actions are hereby consolidated for pretrial purposes pursuant to the provisions of Rule 42 of the Federal Rules of Civil Procedure under the docket number MDL 1570 (the "Consolidated Action"). All references to consolidation in this Order shall refer to consolidation for pretrial purposes pursuant to 28 U.S.C. § 1407. This Order does not constitute a determination that the

Individual Actions should be consolidated for trial, nor does it have the effect of making any entity a party to an action in which it has not been joined and served in accordance with the Federal Rules of Civil Procedure.

2. Additional actions transferred and consolidated with MDL 1570 as “tag-along actions” pursuant to Rules 7.4 and 7.5 of the Rules of Procedure of the Judicial Panel on Multi-District Litigation or designated as “related actions” under the Local Rules of the Southern District of New York (together, “Related Cases”) shall be subject to the provisions of this Order.

3. A Master File, and a Master Docket for that file, are hereby established for these consolidated proceedings. The original of this Order shall be filed by the Clerk in the Master File. The Clerk of the Court shall file all orders, pleadings, motions, and other documents bearing the Docket Number MDL 1570 in the Master File and shall note such filing in the Master Docket. No further copies need be filed or docket entries made, except as provided in Paragraph 5.

4. The Clerk has assigned, or shall assign, a separate docket number (an “S.D.N.Y. Docket Number”) and shall maintain a separate file for each of the actions on Schedule A and each Related Case (the “Individual Actions”). A copy of this Order shall be placed in each such separate file. No further filings need be made in the separate files, except as provided in Paragraph 5. All orders, pleadings, motions, and other documents filed in the Master File will be deemed filed and entered in each individual action to the extent applicable. The Clerk shall ensure that this Order is docketed electronically and distributed through the Electronic Case Filing system.

5. Documents intended to apply only to a particular Individual Action or Actions will, as described in Paragraph 6 below, indicate in their caption the S.D.N.Y. Docket Number(s) of the Individual Action(s) to which they apply. Such documents will be filed and docketed both in the Master File and the separate file(s) for the specified Individual Action(s), in accordance with the Electronic Case Filing system procedures established by the Clerk's Office.

Captions

6. Every paper filed in the Consolidated Action shall have the following caption:

**United States District Court
Southern District of New York**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (RCC) ECF Case
---	-------------------------------

This document relates to: All actions

7. When a paper is intended to be applicable to all of the Individual Actions, the words "All Actions" shall appear after the words "This Document Relates To:" in the caption set forth above and only the Master Docket number will be identified.

8. When a paper is intended to be applicable to some, but not all, of the Individual Actions, the S.D.N.Y. Docket Number for each Individual Action to which the paper applies and the full names of the first plaintiff and first defendant in that action shall appear immediately after the words "This Document Relates To:" in the caption set forth above.

Filings and Service of Papers

9. Pursuant to paragraph 1 of this Court's Case Management Order No. 1, all attorneys who have made appearances in this case must register with the Court's CM/ECF system. Counsel may not opt out of email service for non-court documents. All written communication with the Court of any type or kind whatsoever shall be served on all counsel of record in all the Individual Actions, regardless of which or how many Individual Actions such communication relates to. Service shall be accomplished as follows:

(a) For all documents filed through the ECF system, service shall be deemed complete upon electronic filing through the ECF system and no further service need be made. If at least one member of a law firm representing a party has registered for electronic service through the ECF system, a party filing a document in the ECF system need not serve by mail or other means other attorneys in the same firm, even if the other attorneys' names appear as not having been served electronically through the ECF system.

(b) For documents that are not filed through the ECF system but that nonetheless are required to be served, service shall be by e-mail and shall be necessary only upon those attorneys listed with e-mail contact information in Schedule B. Attorneys who subsequently consent to be served by e-mail shall so notify the Court in writing and provide e-mail contact information to Kreindler & Kreindler.

10. Where voluminous documents that are required to be filed through the ECF format do not exist in electronic format and it would be burdensome to convert them, hard copies may be served by hand, by express courier service, or by mail. Service

of hard copies shall be deemed complete upon hand-delivery or upon delivery to the United States Postal Service or an express courier service.

11. Service Cut-Off Date: Service of the summons and complaint on a defendant not located in a foreign country shall be made in accordance with Federal Rule of Civil Procedure 4(m). Service of the summons and complaint upon a defendant located in a foreign country who has been named as of the date of this order shall be made by October 15, 2004, or, if a motion to effect service through alternative means has been filed with respect to that defendant, service shall be made within 90 days of a decision by this Court on the motion. Any defendant located in a foreign country who is named after the date of this order shall be served within 120 days after being so named, or, if a motion for alternative service is filed in connection with that defendant, within 90 days of a decision on such a motion. A motion for alternative service shall be filed within 60 days of the date on which the defendant has been named. The Court, upon motion or on its own initiative after notice to the plaintiffs, may dismiss the action without prejudice as to any defendant who has not been served or, provided that the plaintiffs show good cause for the failure to serve, the Court may extend the time for service for an appropriate period.

Pleadings and Parties

12. Addition of Parties: Joinder of additional parties must be accomplished by December 31, 2004. Plaintiffs may without further leave of court add or remove parties by listing their names and filing the lists as supplemental pleadings under F.R.C.P. 15(d). The caption in the docket for the Individual Action to which a plaintiff or defendant has been added or removed will be changed to reflect the names of the parties in the Individual Actions as amended by the filing. Plaintiffs added by this procedure need not re-serve defendants who have already been served. Any defendant added by this procedure may, in lieu of any other answer or response to the complaint, and within the same time period allowed for such other answer or response, request, by motion or otherwise, a more definite statement pursuant to F.R.C.P. 12(e). Such request for a more definite statement shall not operate as a waiver of any defenses or objections, including objections based on lack of jurisdiction or improper service. When a defendant as to whom no allegations have been asserted requests a more definite statement pursuant to the procedures set forth herein, plaintiffs shall file the requested statement within 30 days. Rule 12(e) statements filed pursuant to this procedure may be filed as an independent pleading and no Amended Complaint need be filed. The filing of such a more definite statement will be deemed an amendment to plaintiffs' Complaint or Amended Complaint, by incorporation by reference. When a defendant requests a more definite statement pursuant to this procedure, the time for such defendant to answer, move, or otherwise respond to the Complaint shall run from service of the statement so requested.

13. Amendments: Amended pleadings may be filed until July 31, 2005, after which any amendments must be approved by the Court, pursuant to Federal Rule of Civile Procedure 15(a). Plaintiffs may file more definite statements and/or additional allegations against existing defendants by filing statements to this effect, which will be treated and accepted as pleadings and deemed amendments to previously-filed Complaints or Amended Complaints, in lieu of filing an additional Amended Complaint. On July 31, 2005, the plaintiffs shall file an amended complaint that includes all amendments made prior to that date, whether made pursuant to Rule 12(e) or otherwise.

14. RICO Statements: As to all defendants on behalf of whom counsel have entered an appearance in the Federal Insurance action as of the date of this Order, the Federal Insurance plaintiffs shall file a RICO Statement, in the form set forth in this Court's "Instructions for filing RICO Statement," available on the Internet at:

www.nysd.uscourts.gov/judges/usdj/casey.htm

within thirty (30) days of the date of this Order. As to all other defendants named in the Federal Insurance action, the Federal Insurance plaintiffs shall file a RICO Statement within thirty (30) days of the filing of an entry of appearance by counsel on behalf of any such defendant in the Federal Insurance action. Any such RICO Statement shall be deemed an amendment to the Federal Insurance plaintiffs' Complaint or Amended Complaint, by incorporation by reference.

Discovery

15. All discovery responses already served by defendants in the *Burnett* action shall be deemed part of the Consolidated Action. Discovery requests already served in the *Burnett* action to which responses have not yet been served need not be re-served, except that copies of all such requests shall be provided to the Plaintiffs' Executive Committee(s) and to counsel for any party to whom such requests pertain if such counsel has not already been served.

16. Any party may seek the assistance of the Court in obtaining documents from non-party foreign governments or officials through a "letters rogatory" process or otherwise. Any party seeking such assistance shall notify all other parties and all parties together shall submit an agreed form of requests to be sent to the foreign government or official. To the extent that any party sends a representative to personally retrieve documents provided in response to a request from this Court to a foreign government or official, plaintiffs (collectively) and defendants (collectively) shall be entitled to send the same number of representatives. All documents so retrieved shall be deposited with the Court and shall be made available to all parties. The parties shall make such application to this Court as may be necessary to effectuate this provision.

17. Fact Discovery: Written discovery and depositions addressed to non-parties and to or from any defendant that has filed an Answer in any of the Individual Actions as to liability issues only may commence immediately. As to any defendant that has filed a motion to dismiss on grounds of immunity from suit (based on the Foreign Sovereign Immunities Act or diplomatic immunity) or for lack of personal jurisdiction, merits discovery shall not take place until such jurisdictional motion has been resolved by this Court, except upon application to the Court based on extenuating circumstances.

Depositions may proceed concurrently with written discovery. No depositions shall be extended beyond two business days without prior leave of the Court. A party may take a deposition by videotape by so indicating in its Notice of Deposition or by providing written notice that the deposition will be videotaped no less than 10 days before the deposition. Objections to the videotaping of a deposition must be filed and served within 5 days after notice of videotaping is served. Unless the Court has ruled to the contrary prior to the deposition, the deposition may be videotaped. Fact discovery shall be completed by December 31, 2005.

18. Expert discovery: Experts are to be designated and their expert reports exchanged by February 15, 2006. Expert depositions shall commence after February 15, 2006 and shall be completed by April 15, 2006.

19. All liability discovery is to be completed by April 15, 2006.

20. To the extent possible, the parties shall conduct consolidated discovery and all discovery notices served and all responses to all discovery requests in an Individual Action shall be deemed to be part of the Consolidated Action and each Individual Action.

21. Interim deadlines may be extended by the parties on consent without application to the Court, provided the parties are certain they can still meet the discovery completion date ordered by the Court, which shall not be adjourned except upon approval by the Court.

22. Document Translation: A party producing documents in a language other than English shall produce existing translations of those documents; however, translations produced by or for a party's attorney need not be produced.

Dispositive Motions

23. All motions and applications shall be governed by the Court's Individual Rules of Practice.

24. A pre-motion conference will be required before any dispositive motion is filed, except motions to dismiss. The Court will confirm the parties' briefing schedule at the pre-motion conference. After the papers are fully submitted, the parties will be informed whether oral arguments are required. With respect to motions to dismiss, the Defendants (or the parties, to the extent they agree) will submit a proposed briefing and oral argument schedule to the Court in advance of the next Case Management Conference.

25. With respect to motions to dismiss, the parties shall submit to the Court an agreed-upon, proposed briefing schedule.

26. With respect to motions to dismiss in the Federal Insurance matter, defendants who have been served on or before March 10, 2004 shall file their motions to dismiss in accordance with any stipulations approved by the Court or such other schedule as the Court may order; opposing papers shall be filed within 60 days of the filing of any such papers and reply papers shall be filed within 14 days after receipt of opposing papers.

27. No summary judgment motion will be heard before the close of discovery.

Admission of Attorneys and Admissions

28. In accordance with Rule 1.4 of the Rules Procedure of the Judicial Panel on Multidistrict Litigation, any attorney of record in any of the Individual Actions may continue to represent his or her client in this Court in this action. Such attorneys shall be deemed admitted *pro hac vice* for purposes of the Consolidated Action and need not obtain local counsel.

Case Management Conferences

29. The next Case Management Conference shall take place on September 13, 2004. Plaintiffs' Liaison Counsel and defendants' counsel shall confer at least five (5) business days in advance of each scheduled Case Management Conference for the purpose of attempting to narrow and agree upon issues to be discussed at the conference and for the further purpose of preparing and submitting to the Court an agreed-upon Case Management Conference agenda, including a schedule of motions that are ready to be heard. Such agenda shall be submitted to the Court at least three (3) business days in advance of the Case Management conference and, to the extent reasonable, the parties shall be limited to discussion of the matters on the agenda. To the extent that the parties are unable to agree upon a joint agenda, separate proposed agendas may be submitted.

So Ordered.



Richard Conway Casey, U.S.D.J.

June ¹⁵~~16~~, 2004
New York, New York

Schedule A – Individual Actions Consolidated in MDL 1570

-----X

THOMAS BURNETT, SR., et al.,

Plaintiffs,

Civ. Action No. 03 CV 9849 (RCC)

- against -

AL BARAKA INVESTMENT &
DEVELOPMENT CORP., et al.,

Defendants.

-----X

KATHLEEN ASHTON, et al.,

Civ. Action No. 02 CV 6977 (RCC)

Plaintiffs,

- against -

AL QAEDA ISLAMIC ARMY, et al.,

Defendants.

-----X

FIONA HAVLISH, et al.,

Plaintiffs,

Civ. Action No. 03 CV 9848 (RCC)

- against -

SHEIKH USAMA BIN-LADEN, et al.,

Defendants.

-----X

WALTER TREMSKY, et al.

Plaintiffs,

Civ. Action No. 02 CV 7300 (RCC)

- against -

OSAMA BIN LADEN, et al.,

Defendants.

-----X

-----X

GLADYS SALVO, et al.

Plaintiffs,

Civ. Action No. 03 CV 5071 (RCC)

- against -

AL QAEDA ISLAMIC ARMY, et al.,

Defendants.

-----X

JOHN P. O'NEILL, JR., et al.

Plaintiffs,

Civ. Action No. 03 CV 1076 (RCC)

- against -

THE REPUBLIC OF IRAQ, et al.,

Defendants.

-----X

ESTATE OF JOHN P. O'NEILL, SR.

Plaintiffs,

Civ. Action No. 03 CV 1923

- against -

AL BARAKA INVESTMENT &
DEVELOPMENT CORP., et al.

Defendants.

-----X

ESTATE OF JOHN P. O'NEILL, SR.

Plaintiffs,

Civ. Action No. 03 CV 1922

- against -

KINGDOM OF SAUDI ARABIA et al

Defendants.

-----X

-----X

FEDERAL INSURANCE CO., et al.

Plaintiffs

Civ. Action No. 03 CV 6978 (RCC)

_ against -

AL QAIDA

Defendants.

-----X

THOMAS BURNETT, Sr. et al.

Plaintiffs,

Civ. Action No. 03 CV 5738

- against

AL BARAKA INVESTMENT &
DEVELOPMENT CORP., et al.

Defendants.

-----X

BARRERA et al.

Plaintiffs,

Civ. Action No. 03 CV 7036

- against -

AL QAEDA ISLAMIC ARMY et al.

Defendants.

-----X

Schedule B: Attorneys to be served electronically

Plaintiffs' Counsel (June 15, 2004)

03 MDL 1570 SERVICE LIST

In re: Terrorist Attack on September 11, 2001, 03 MD 1570 (Judge Richard Casey),
U.S. District Court for the Southern District of New York

Plaintiffs' Counsel	Underlying Case Name
ALLAN GERSON, ESQUIRE 4221 Lenore Lane, N.W. Washington, DC 20008 Tel: (202) 966-8557 Fax: (202) 966-8557 gerson@gilgintl.org	Burnett, et al. v. Al Baraka Investment and Development Corp., et al.
BARASCH McGARRY SALZMAN PENSON & LIM 11 Park Place New York, NY 10007 Tel: (212) 385-8000 Fax: (212) 385-7845 Michael Barasch, Esquire michael@personalinjuryjustice.com	Ashton, et al. v. Al Qaeda, et al.
BARTIMUS, FRICKLETON, ROBERTSON & OBETZ 200 Madison Avenue, Suite 1000 Jefferson City, MO 65101 Tel: (573) 659-4454 Fax: (573) 659-4460 Edward D. Robertson, Esquire chiprob@earthlink.net Mary Winter, Esquire marywinter@earthlink.net	Burnett, et al. v. Al Baraka Investment and Development Corp., et al.
BAUMEISTER & SAMUELS, PC One Exchange Place, 15 th Floor New York, NY 10006-3008 Tel: (212) 363-1200 Fax: (212) 363-1346 Michel F. Baumeister, Esquire mbaumeister@baumeisterlaw.com Thea M. Capone, Esquire tcapone@baumeisterlaw.com Douglas A. Latto, Esquire dlatto@baumeisterlaw.com	Ashton, et al. v. Al Qaeda, et al.

BRODER & REITER 350 Fifth Avenue, Suite 2811 New York, NY 10118 Tel: (212) 244-2000 Fax: (212) 268-5297 Aaron J. Broder, Esquire Jonathan C. Reiter, Esquire info@broderreiter.com	Ashton, et al. v. Al Qaeda, et al.
BROWN, TERRELL, HOGAN, ELLIS, McCLAMMA, YEGELWEL PA 8th Floor - Blackstone Building 233 East Bay St. Jacksonville, FL 32202 Evan J. Yegelwel, Esquire ejy@bthemy.com D'Vorah Ben-Moshe dbm@bthemy.com	Havlish, et al. v. Bin Laden, et al.
BURBIDGE and MITCHELL 139 East South Temple, Suite 2001 Salt Lake City, UT 84111 Tel: (801) 355-6677 Fax: (801) 355-2341 D. Richard Burbidge, Esquire rburbidge@burbidgeandmitchell.com	Havlish, et al. v. Bin Laden, et al.
CORDRAY LAW FIRM 40 Calhoun Street, Suite 420 Post Office Drawer 22857 Charleston, SC 29413-2857 Tel: (843) 577-9761 Fax: (843) 853-6330 Jack D. Cordray, Esquire jack@cordraylawfirm.com	Burnett, et al. v. Al Baraka Investment and Development Corp., et al.

<p>COZEN O'CONNOR 1900 Market Street Philadelphia, PA 19103 Tel: (215) 665-2000 Fax: (215) 665-2013</p> <p>Stephen A. Cozen, Esquire Elliott R. Feldman, Esquire Sean P. Carter, Esquire Mark T. Mullen, Esquire Lisa Haas, Esquire J. Scott Tarbutton, Esquire.</p> <p>MDL1570@cozen.com</p>	<p>Federal Insurance Co., et al. v. Al Qaida, et al.</p>
<p>DAVIS, SAPERSTEIN & SALOMON, P.C. 375 Cedar Lane Teaneck, NJ 07666 Tel: (201) 907-5000 Fax: (201) 692-0444</p> <p>Samuel L. Davis, Esquire sam@dsslaw.com</p>	<p>Burnett, et al. v. Al Baraka Investment and Development Corp., et al.</p>
<p>EPSTEIN BECKER & GREEN, P.C. 250 Park Avenue New York, NY 10177-1211 Tel: (212) 351-4500 Fax: (212) 661-0989</p> <p>Clare M. Sproule, Esquire csproule@ebglaw.com</p>	<p>Burnett, et al. v. Al Baraka Investment and Development Corp., et al.</p>
<p>GAIR, GAIR, CONASON, STEIGMAN & MACKAUF 80 Pine Street New York, NY 10005 Tel: (212) 943-1090 Fax: (212) 425-7513</p> <p>Robert Conason, Esquire rconason@gairgair.com</p> <p>Howard Hershenhorn, Esquire hsh@gairgair.com</p>	<p>Burnett, et al. v. Al Baraka Investment and Development Corp., et al.</p>
<p>GALIHER, DeROBERTIS, NAKAMURA, ONO & TAKITANI 610 Ward Avenue, Suite 200 Honolulu, HI 96814 Tel: (808) 597-1400 Fax: (808) 591-2608</p> <p>Gary O. Galiher, Esquire gog@gogaliher.com</p>	<p>Burnett, et al. v. Al Baraka Investment and Development Corp., et al.</p>

HANLY CONROY BIERSTEIN & SHERIDAN LLP 415 Madison Avenue New York, NY 10017 Tel: (212) 401-7600 Fax: (212) 401-7618 Andrea Bierstein, Esquire abierstein@hanlyconroy.com Mary Palmer, Paralegal mpalmer@hanlyconroy.com	Burnett, et al. v. Al Baraka Investment and Development Corp., et al.
HOWARTH & SMITH 800 Wilshire Boulevard, Suite 750 Los Angeles, CA 90017 Tel: (213) 955-9400 Fax: (213) 622-0791 Robert D. Brain, Esquire Don Howarth, Esquire Suzelle M. Smith, Esquire MDL1570@howarth-smith.com	Burnett, et al. v. Al Baraka Investment and Development Corp., et al. Havlish, et al. v. Bin Laden, et al.
THE HUGE LAW FIRM PLLC 7 th Floor 1001 Pennsylvania Avenue, NW Washington, DC 20004 Tel: (843) 722-1628 Fax: (202) 318-1261 Harry Huge, Esquire harryhuge@comcast.net	Burnett, et al. v. Al Baraka Investment and Development Corp., et al.
J. DAVID O'BRIEN, ESQUIRE 20 Vesey Street, Suite 700 New York, NY 10007 Tel: (212) 571-6111 Fax: (212) 571-6166 obrienlawusa@aol.com	Tremsky, et al. v. Osama Bin Laden, et al.
JAROSLAWICZ & JAROS, ESQUIRES 150 William Street New York, NY 10038 Tel: (212) 227-2780 Fax: (212) 227-5090 David Jaroslawicz, Esquire davidjaroslawicz@yahoo.com	Ashton, et al. v. Al Qaeda, et al.

JUDICIAL WATCH, INC. 501 School Street, SW, Suite 725 Washington, DC 20024 Tel: (202) 646-5175 Fax: (202) 646-5199 Paul J. Orfanedes, Esquire James F. Peterson, Esquire jpeterson@judicialwatch.org	Burnett v. Al Baraka Inv. and Dev. Corp., et al.
KREINDLER & KREINDLER 100 Park Avenue New York, NY 10017 Tel: (212) 687-8181 Fax: (212) 972-9432 Justin T. Green, Esquire jgreen@kreindler.com James P. Kreindler, Esquire jkreindler@kreindler.com Andrew J. Maloney, III, Esquire amaloney@kreindler.com Marc S. Moller, Esquire mmoller@kreindler.com Vince Parrett, Esquire vparrett@kreindler.com Steven Habig shabig@kreindler.com	Ashton, et al. v. Al Qaeda, et al.
LAMM, RUBENSTONE, TOTARO & DAVID, LLC 4 Greenwood Square, Suite 200 P.O. Box 8544 Bensalem, PA 19020-8544 Tel: (215) 638-9330 Fax: (215) 638-2867 Edward H. Rubenstone, Esquire erubenstone@lrtd.com	Havlish, et al. v. Bin Laden, et al.

<p>LAW OFFICES OF JERRY S. GOLDMAN AND ASSOCIATES, P.C. 111 Broadway, 13th Floor New York, NY 10006 Tel: (212) 385-1005 Fax: (212) 346-4665</p> <p>Jerry S. Goldman, Esquire jgoldman@goldmanlawyers.com</p> <p>Gina Mac Neill, Esquire GMacNeill@goldmanlawyers.com</p>	<p>Estate of John P. O'Neill, Sr., et al v. Kingdom of Saudi Arabia, et al.</p>
<p>LAW OFFICES OF JOSHUA M. AMBUSH, LLC 600 Reistertown Road Suite 200 A Baltimore, MD 21208 Tel: (410) 484-2070 Fax: (410) 484-9330</p> <p>Joshua M. Ambush, Esquire joshua@ambushlaw.com</p> <p>Helen Louise Hunter, Esquire hlsh@aol.com</p>	<p>Estate of John P. O'Neill, Sr., et al v. Kingdom of Saudi Arabia, et al.</p>
<p>LEE LEE & LEE 422 S. Gay Street Knoxville, TN 37902 Tel: (865) 544-0101 Fax: (865) 544-0536</p> <p>J.D. Lee, Esquire jdlee@jdlee.com</p> <p>David Lee, Esquire davidl@lancairsouth.com</p>	<p>Burnett, et al. v. Al Baraka Investment and Development Corp., et al.</p> <p>Havlish, et al. v. Bin Laden, et al.</p>
<p>MELLON WEBSTER & SHELLEY 87 North Broad Street Doylestown, PA 18901 Tel: (215) 348-7700 Fax: (215) 348-0171</p> <p>Thomas E. Mellon, Jr., Esquire tmellon@mellonwebster.com</p> <p>Stephen Corr, Esquire scorr@mellonwebster.com</p> <p>Jack Corr, Esquire jcorr@mellonwebster.com</p>	<p>Havlish, et al. v. Bin Laden, et al</p> <p>Burnett, et al. v. Al Baraka Investment and Development Corp., et al.</p>

<p>MOTLEY RICE LLC 28 Bridgeside Boulevard P.O. Box 1792 Mount Pleasant, SC 29465 Tel: (843) 216-9000 Fax: (843) 216-9450</p> <p>Ronald L. Motley, Esquire Jodi Westbrook Flowers, Esquire Donald A. Migliori, Esquire Jeffrey S. Thompson, Esquire William Narwold, Esquire Michael E. Elsner, Esquire Ingrid Moll, Esquire Justin Kaplan, Esquire</p> <p>MDL1570@motleyrice.com</p>	<p>Burnett, et al. v. Al Baraka Investment and Development Corp., et al.</p> <p>Havlish, et al. v. Bin Laden, et al.</p>
<p>PROF. PAUL R. DUBINSKY New York Law School 7 Worth Street New York, NY 10013 Tel: (212) 431-2157 Fax: (212) 431-1830</p> <p>Paul R. Dubinsky pdubinsky@nyls.edu</p>	<p>Estate of John P. O'Neill, Sr., et al v. Kingdom of Saudi Arabia, et al.</p>
<p>NOLAN LAW GROUP 20 North Clark Street, 30th Floor Chicago, IL 60602 Tel: (312) 630-4000 Fax: (312) 630-4011</p> <p>Floyd Wisner, Esquire faw@nolan-law.com</p> <p>Paula Jett, Assistant plj@nolan-law.com</p>	<p>Salvo, et al. v. Al Qaeda Islamic Army, et al.</p>
<p>OLIVER & SELLITTO, ESQS. 205 Bond Street Asbury Park, NJ 07712 Tel: (732) 988-1500 Fax: (732) 775-7404</p> <p>Anthony M. Sellitto, Jr., Esquire asellitto.911suit@aslaw.com</p>	<p>Burnett, et al. v. Al Baraka Investment and Development Corp., et al.</p>

PROF. ROGER ALFORD Pepperdine University School of Law 24255 Pacific Coast Hwy Malibu, CA 90263 Tel: (310) 506 7626 Fax: (310) 506 4063 Professor Roger Alford roger.alford@pepperdine.edu	Estate of John P. O'Neill, Sr., et al v. Kingdom of Saudi Arabia, et al.
PRYOR CASHMAN SHERMAN & FLYNN LLP 410 Park Avenue, 10th Floor New York, New York 10022 Tel: (212) 421-4100 Fax: (212) 326-0806 Vincent F. Pitta, Esquire vpitta@pryorcashman.com	Burnett, et al. v. Al Baraka Investment and Development Corp., et al.
RAMEY & HAILEY 3815 River Crossing Parkway, Suite 340 Indianapolis, IN 46240 Tel: (317) 848-3249 Fax: (317) 848-3259 Richard D. Hailey, Esquire rhailey@sprynet.com	Burnett, et al. v. Al Baraka Investment and Development Corp., et al. Havlish, et al. v. Bin Laden, et al.
RILEY DeBROTA LLP 3815 River Crossing Parkway, Suite 340 Indianapolis, IN 46240 Tel: (317) 848-7939 Fax: (317) 848-7831 Amy Ficklin DeBrotta, Esquire William Riley, Esquire saudisuit@rileydebrotta.com	Burnett, et al. v. Al Baraka Investment and Development Corp., et al. Havlish, et al. v. Bin Laden, et al.
RUBENSTEIN & RYNECKI 16 Court Street, Suite 1717 Brooklyn, NY 11241 Tel: (718) 522-1020 Fax: (718) 522-3804 Sanford A. Rubenstein, Esquire Rubrynlaw@aol.com	Burnett, et al. v. Al Baraka Investment and Development Corp., et al.

RUSSO, SCAMARDELLA & D'AMATO, P.C. 1010 Forest Avenue Staten Island, NY 10310 Tel: (718) 442-0900 Fax: (718) 816-8037 Guy Molinari, Esquire guy@statenlaw.com John D'Amato, Esquire jdamato@statenlaw.com	Burnett, et al. v. Al Baraka Investment and Development Corp., et al.
SACKS & SACKS LLP 150 Broadway New York, NY 10038 Tel: (212) 964-5570 Fax: (212) 349-2141 Kenneth N. Sacks, Esquire ken@sacks-sacks.com	Burnett, et al. v. Al Baraka Investment and Development Corp., et al.
SCHONBRUN, DE SIMONE, SEPILOW, HARRIS & HOFFMAN 723 Ocean Front Walk Venice, California 90291 Tel: (310) 396-0731 Fax: (310) 399-7040 Paul L. Hoffman, Esquire Hoffpaul@aol.com	Estate of John P. O'Neill, Sr., et al v. Kingdom of Saudi Arabia, et al.
SHULTZ & ROLLINS 1980 East Fort Lowell Road Suite 200 Tucson, Arizona 85719 Tel: (520) 577-7777 Silas H. Shultz, Esquire mail@shultz-rollins.com Michael Rollins, Esquire mike@shultz-rollins.com	Estate of John P. O'Neill, Sr., et al v. Kingdom of Saudi Arabia, et al.

<p>SPEISER, KRAUSE, NOLAN & GRANITO 140 East 45th Street, 34th Floor New York, NY 10017 Tel: (212) 661-0011 Fax: (212) 953-6483</p> <p>Frank H. Granito, III, Esquire f3g@ny.speiskrause.com</p> <p>Kenneth P. Nolan, Esquire kpn@ny.speiskrause.com</p> <p>Jeanne M. O'Grady, Esquire jog@ny.speiskrause.com</p> <p>John F. Schutty, Esquire jfs@ny.speiskrause.com</p>	<p>Ashton, et al. v. Al Qaeda, et al.</p>
<p>SULLIVAN, PAPAIN, BLOCK, McGRATH & CANNANO, P.C. 120 Broadway Avenue, 18th Floor New York, NY 10271 Tel: (212) 732-9000 Fax: (212) 266-4141</p> <p>Michael N. Block, Esquire mblock@triallaw1.com</p> <p>Edward Marcowitz, Esquire emarcowitz@triallaw1.com</p> <p>Andrew Carboy, Esquire acarboy@triallaw1.com</p>	<p>Burnett, et al. v. Al Baraka Investment and Development Corp., et al.</p>
<p>PROF. MICHAEL J. BAZYLER Whittier Law School 3333 Harbor Blvd. Costa Mesa, CA 92626 Tel: (310) 926-0149 Fax: (714) 444-1854</p> <p>Michael J. Bazylar bazylar@aol.com</p>	<p>Estate of John P. O'Neill, Sr., et al v. Kingdom of Saudi Arabia, et al.</p>

<p>WIGGINS, CHILDS, QUINN & PANTAZIS, PC 7 Dupont Circle, NW, Suite 200 Washington, DC 20036</p> <p>Dennis G. Pantazis, Esquire dgp@wcqp.com</p> <p>Timothy B. Fleming tfleming@wcqp.com</p> <p>Lori B. Kisch, Esquire lkisch@wcqp.com</p>	<p>Havlish, et al. v. Bin Laden, et al.</p>
<p>WINDER & HASLAM P.C. 175 West 200 South, Suite 4000 P.O. Box 2668 Salt Lake City, UT 84111-2668 Tel: (801) 322-2222 Fax: (801) 322-2282</p> <p>Donald J. Winder, Esquire dwinder@winhas.com</p>	<p>Havlish, et al. v. Bin Laden, et al.</p>

Defendants' Counsel (June 8, 2004)

03 MDL 1570 SERVICE LIST

In re: Terrorist Attack on September 11, 2001, 03 MD 1570 (Judge Richard Casey),
U.S. District Court for the Southern District of New York

Defendants' Counsel
<p>ARNOLD & PORTER LLP 555 Twelfth Street, NW Washington, DC 20004 Tel: (202) 942-5000 Fax: (202) 942-5999</p> <p><i>Counsel for Saudi Economic & Development Company, International Development Foundation, and Sheikh Mohammed Salim bin Mahfouz</i></p> <p>David Gersch, Esquire david_gersch@aporter.com</p> <p>Jean E. Kalicki, Esquire jean_kalicki@aporter.com</p> <p>Brian C. Wilson, Esquire brian_wilson@aporter.com</p>
<p>ARNOLD & PORTER LLP 399 Park Avenue New York, NY 10022-4690 Tel: (212) 715-1000 Fax: (212) 715-1399</p> <p><i>Counsel for Saudi Economic & Development Company, International Development Foundation, and Sheikh Mohammed Salim bin Mahfouz</i></p> <p>Craig Stewart, Esquire craig_stewart@aporter.com</p>

BAKER BOTTS LLP

The Warner
1299 Pennsylvania Avenue, N.W.
Washington, DC 20004-2400
Tel: (202) 639-7700
Fax: (202) 639-7890

Counsel for HRH Prince Sultan Bin Abdulaziz Al-Saud and HRH Prince Salman Bin Abdulaziz Al-Saud

Casey Cooper, Esquire
William H. Jeffress, Jr., Esquire
Jamie Kilberg, Esquire
Sara Kropf, Esquire

MDL1570@bakerbotts.com

BECKER, HADEED, KELLOGG & BERRY

5501 Backlick Road, Suite 220
Springfield, VA 22151
Tel: (703) 333-3224
Fax: (703) 256-5431

Counsel for Success Foundation, Inc.; Muslim World League Offices-NY; Muslim World League-VA; and Mohamed S. Omeish

Michael Hadeed, Jr., Esquire
mhadeed@beckerhadeed.com

BERNABEI & KATZ, PLLC

1773 T Street, N.W.
Washington, DC 20009-7139
Tel: (202) 745-1942
Fax: (202) 745-2627

Counsel for Dr. Abdullah M. Al-Turki; Dr. Abdullah Naseef; Dr. Abdullah Al-Obaid; Dr. Abdul Rahman Al Swailem; Sheik Saleh Al-Hussayen; Sheik Shahir Batterjee; Mushayt for Trading Company; Mohammed Ali Sayed Mushayt; Sheik Hamad Al-Husaini; Saudi Arabian Red Crescent Society; Sheik Salman Al-Oadah; Sheik Safer Al-Hawali; Al Haramain Islamic Foundation, Inc.; Soliman H.S. Al-Buthi; Soliman J. Khuderia; Talal M. Badkook; Dr. Adnan Basha; and Perouz Seda Ghaty

Lynne A. Bernabei, Esquire
LBernabei@aol.com

Alan R. Kabat, Esquire
Kabat@bernabeikatz.com

BONNER, KIERNAN, TREBACH AND CROCIATA

1250 Eye Street, N.W.
Washington, DC 20005
Tel: (202) 712-7000
Fax: (202) 712-7100

Counsel for Khalid Bin Mahfouz

Michael Nussbaum, Esquire
mnussbaum@bktc.net

BRYAN CAVE LLP

1290 Avenue of the Americas
New York, NY 10104-3300
Tel: (212) 541-2000
Fax: (212) 541-4630

Counsel for Prince Naif bin Abdulaziz Al-Saud

Michael G. Biggers, Esquire
mgbiggers@bryancave.com

BRYAN CAVE, LLP

700 Thirteenth Street N.W.
Washington, DC 20005-3960
Tel: (202) 508-6000
Fax: (202) 508-6200

Counsel for Prince Naif bin Abdulaziz Al-Saud

James M. Cole, Esquire
jmcole@bryancave.com

James J. Murphy, Esquire
jjmurphy@bryancave.com

BUSCH & NUBANI, P.C.

5029 Backlick Road, Suite A
Annandale, VA 22003
Tel: (703) 658-5151
Fax: (703) 658-9200

Counsel for Al Haramain Islamic Foundation, Aqeel Al-Aqeel, Saleh O. Badahdah, Adballah bin Adbul Aziz Almosleh, Abdullah M. Al-Mahdi, Adel A.J. Batterjee, Jamal Ahmad Mostafa Khalifa, Islamic Assembly of North America; and Sulaiman Al-Ali

Ashraf W. Nubani, Esquire
anubani@rbanlaw.com

CHADBOURNE & PARKE LLP

30 Rockefeller Plaza
New York, NY 10112
Tel: (212) 408-5581
Fax: (646) 710-5581

Counsel for Yousef Jameel

Kenneth A. Caruso, Esquire
Marvin R. Lange, Esquire
Jeffrey I. Wasserman, Esquire

+MDL1570@chadbourne.com

CURTIS, MALLET-PREVOST, COLT & MOSLE LLP

101 Park Avenue
New York, NY 10178
Tel: (212) 696-6000
Fax: (212) 697-1559

Counsel for HRH Prince Abdullah Al Faisal Bin Abdulaziz Al Saud, Alfaisaliah Group, Faisal Group Holding Co., and Mohammed Bin Abdulrahman Al Ariefy

T. Barry Kingham, Esquire
bkingham@cm-p.com

Daria M. Ciaputa, Esquire
dciaputa@cm-p.com

Jesse Clarke, Esquire
jclarke@cm-p.com

FULBRIGHT & JAWORSKI, LLP

801 Pennsylvania Avenue, N.W.
Washington, DC 20004
Tel: (202) 662-4659
Fax: (202) 662-4643

Counsel for Nimir Petroleum, LLC

Matthew H. Kirtland, Esquire
mkirtland@fulbright.com

GIBSON, DUNN & CRUTCHER LLP

1050 Connecticut Avenue, N.W.
Washington, DC 20036
Tel: (202) 955-8213
Fax: (202) 530-9566

Counsel for Salamiddin Abduljawad

John C. Millian, Esquire
jmillian@gibsondunn.com

GILLEN PARKER & WITHERS LLC

One Securities Centre, Suite 1050
3490 Piedmont Road, NE
Atlanta, GA 30305-1743
Tel: (404) 842-9700
Fax: (404) 842-9750

Counsel for Mar-Jac Poultry, Inc.

Wilmer Parker, III, Esquire
bparker@gcpwlaw.com

GORDON & SIMMONS, LLC

131 West Patrick Street
P.O. Box 430
Frederick, MD 21705-0430
Tel: (301) 662-9122
Fax: (301) 698-0392

Counsel for Zahir H. Kazmi

Roger C. Simmons, Esquire
Victor E. Cretella, III, Esquire
officemail@gordonsimmons.com

GRAY CARY WARE & FREIDENRICH LLP

1625 Massachusetts Avenue, N.W., Suite 300
Washington, DC 20036
Tel: (202) 238-7700
Fax: (202) 238-7701

Counsel for African Muslim Agency; Heritage Education Trust; International Institute of Islamic Thought; Mar-Jac Investments, Inc.; Reston Investments, Inc.; Safa Trust; York Foundation; Taha Al-Alwani; Muhammad Ashraf; M. Omar Ashraf; M. Yaqub Mirza; Iqbal Unus; Jamal Barzinji; Sterling Management Group; Sterling Charitable Gift Fund Inc.; Mena Corporation; Grove Corporate, Inc.; and Sana-Bell, Inc.

Nancy Luque, Esquire
nluque@graycary.com

Donna Sheinbach, Esquire
dsheinbach@graycary.com

HANANIA & KHADER

6066 Leesburg Pike, Suite 101
Falls Church, VA 22041
Tel: 703-778-2400
Fax: 703-778-2407

Counsel for Abdul Rahman Al-Almoudi; Tarik Hamdi; World Assembly of Muslim Youth; Mohammed Hussein Al Almoudi; and Taibah International Aid Association

Maher Hanania, Esquire
Mhanania@hknlaw.com

Angela Hensley
Ahensley@hknlaw.com

JONES DAY

51 Louisiana Avenue, N.W.
Washington, DC 20001
Tel: (202) 879-3939
Fax: (202) 626-1700

Counsel for Saudi Binladin Group, Inc.; Bakr M. Bin Laden; Omar Bin Laden; Tarek M. Bin Laden; and Khalid Bin Mahfouz

Stephen J. Brogan, Esquire
Timothy J. Finn, Esquire
James E. Gauch, Esquire
Michael P. Gurdak, Esquire
Jonathan C. Rose, Esquire
Michael Shumaker, Esquire
Jennifer Shumaker, Esquire
Melissa Stear, Esquire

JonesDayMDL1570@jonesday.com
dmcCaffrey@jonesday.com

JONES DAY

222 East 41st Street
New York, NY 10017-6702
Tel: (212) 326-3939
Fax: (212) 755-7306

Counsel for Saudi Binladin Group, Inc.; Bakr M. Bin Laden; Omar Bin Laden; Tarek M. Bin Laden; and Khalid Bin Mahfouz

E. Michael Bradley, Esquire
Geoffrey S. Stewart, Esquire

JonesDayMDL1570@jonesday.com
dmcCaffrey@jonesday.com

JOSHUA L. DRATEL, P.C.

14 Wall Street, 28th Floor
New York, NY 10005
Tel: (212) 732-0707
Fax: (212) 571-6341

Counsel for Sami Omar Al-Hussayen

Joshua L. Dratel, Esquire
jdratel@joshuadratel.com

Marshall A. Mintz, Esquire
mmintz@joshuadratel.com

KELLOGG, HUBER, HANSEN, TODD & EVANS, P.L.L.C.

1615 M Street, N.W., Suite 400
Sumner Square
Washington, DC 20036-3209
Tel: (202) 326-7900
Fax: (202) 326-7999

Counsel for Prince Turki Al-Faisal Bin Abdulaziz Al-Saud, Prince Bandar bin Sultan bin Abdulaziz, Princess Haifa Al Faisal, and The Kingdom of Saudi Arabia

David C. Frederick, Esquire
Michael J. Guzman, Esquire
Mark C. Hansen, Esquire
Michael K. Kellogg, Esquire
J.C. Rozendaal, Esquire

KelloggMDL1570@khhte.com
Mguzman@khhte.com

KING & SPALDING LLP

1185 Avenue of the Americas
New York, NY 10036
Tel: (212) 556-2100
Fax: (212) 556-2222

Counsel for Arab Bank PLC

Richard T. Marooney, Esquire
rmarooney@kslaw.com

Jeanette M. Viggiano, Esquire
jviggiano@kslaw.com

LAW FIRM OF OMAR T. MOHAMMEDI

200 Madison Avenue, Suite 1901
New York, NY 10016-3903
Tel: 212-752-3846
Fax: 212-725-9160

Counsel for World Assembly of Muslim Youth; WAMY International

Omar T. Mohammedi, Esquire
omohammedi@otmlaw.com

LAW FIRM OF OMAR T. MOHAMMEDI

2201 NE 52nd Street, Suite 205
Lighthouse Point, FL 33064
Tel: 954-428-7757

Counsel for World Assembly of Muslim Youth; WAMY International

Khurum Wahid, Esquire
Khurum.Wahid@verizon.net

MARTIN F. McMAHON & ASSOCIATES

1150 Connecticut Avenue, N.W., Suite 900
Washington, DC 20036
Tel: (202) 862-4343
Fax: (202) 828-4130

Counsel for Saleh Abdullah Kamei; Al Baraka Investment & Development Corp.; International Islamic Relief Organization; Rabita Trust; Dallah Al Baraka Group, LLC; Makkah Mukarrahman Charity Trust; and Wael Jalaidan

Martin F. McMahon, Esquire
Christopher Smith, Esquire
Stephanie Wall Fell

lawmfm@aol.com

McDERMOTT WILL & EMERY LLP

600 13th Street, N.W.
Washington, DC 20005-3096
Tel: (202) 756-8000
Fax: (202) 756-8087

Counsel for Yassin Abdullah Al Kadi

Thomas P. Steindler, Esquire
Stanton D. Anderson, Esquire

MDLNo1570Group@mwe.com

PATTON BOGGS LLP

2550 M Street, N.W.
Washington, DC 20037
Tel: (202) 457-6000
Fax: (202) 457-6315

Counsel for National Commercial Bank

Ronald S. Liebman, Esquire
rliebman@pattonboggs.com

Mitchell Berger, Esquire
mberger@pattonboggs.com

ROBBINS, RUSSELL, ENGLERT, ORSECK & UNTEREINER LLP

1801 K Street, NW, Suite 411
Washington, DC 20006
Tel: (202) 775-4500
Fax: (202) 775-4510

Counsel for Saudi High Commission

Lawrence S. Robbins, Esquire
lrobbins@robbinsrussell.com

Roy T. Englert, Jr., Esquire
renglert@robbinsrussell.com

Max Huffman, Esquire
mhuffman@robbinsrussell.com

SHEARMAN & STERLING LLP

599 Lexington Avenue
New York, NY 10022-6069
Tel: (212) 848-4000
Fax: (212) 848-7179

Counsel for Saudi American Bank

Brian H. Polovoy, Esquire
Daniel M. Segal, Esquire
Henry Weisburg, Esquire

MDL1570@shearman.com

HUSSEIN SHOUKRY LAW FIRM

Adham Commercial Center, 9th Floor
Medina Road
PO Box 667
Jeddah 21421, Saudi Arabia

Counsel for HRH Prince Mohamed al Faisal al Saud

Kamal Hussein Shoukry

STEPTOE & JOHNSON L.L.P.

1330 Connecticut Avenue, N.W.
Washington, DC 20036
Tel: (202) 429-3000
Fax: (202) 429-3902

Counsel for Mohammad Bin Abdullah Aljomaih

Christopher T. Lutz, Esquire
clutz@steptoe.com

UNITED STATES ATTORNEY'S OFFICE

86 Chambers Street, Third Floor
New York, NY 10007
Tel: (212) 637-2709
Fax: (212) 637-2717

Sarah S. Normand
Assistant U.S. Attorney
sarah.normand@usdoj.gov

UNITED STATES DEPARTMENT OF JUSTICE

Civil Division, Federal Programs Branch
P.O. Box 883
Washington, DC 20044
Tel: (202) 514-3367
Fax: (202) 616-8470

Elizabeth J. Shapiro, Esquire
Elizabeth.Shapiro@usdoj.gov

WHITE & CASE LLP

601 Thirteenth Street, N.W.
Washington, DC 20005-3807
Tel: (202) 626-3600
Fax: (202) 639-9355

Counsel for Al Rajhi Banking & Investment Corporation

Christopher M. Curran, Esquire
Nicole E. Erb, Esquire

AlRajhiBankMDL1570@whitecase.com

WHITE & CASE LLP

1155 Avenue of the Americas
New York, NY 10036-2787
Tel: (212) 819-8200
Fax: (212) 354-8113

Counsel for DMI Administrative Services, S.A.

Tim McCarthy, Esquire
tmccarthy@whitecase.com

James J. McGuire, Esquire
jmcguire@whitecase.com

WILLIAMS & CONNOLLY LLP

725 12th Street, N.W.
Washington, DC 20005
Tel: (202) 434-5000
Fax: (202) 434-5245

Counsel for Abdul Rahman Bin Kahlid Bin Mafouz

Gerald A. Feffer, Esquire
gfeffer@wc.com

Peter J. Kahn, Esquire
pkahn@wc.com

Thomas C. Viles, Esquire
tviles@wc.com

WILMER CUTLER PICKERING HALE AND DORR LLP

1600 Tysons Boulevard, 10th Floor
McLean, VA 22102
Tel: (703) 251-9700
Fax: (202) 663-6363

Counsel for HRH Prince Mohamed Al Faisal Al Saud

David P. Donovan, Esquire
david.donovan@wilmerhale.com

WILMER CUTLER PICKERING HALE AND DORR LLP

2445 M Street, N.W.
Washington, DC 20037
Tel: (202) 663-6000
Fax: (202) 663-6363

Counsel for HRH Prince Mohamed Al Faisal Al Saud

Louis R. Cohen, Esquire
louis.cohen@wilmerhale.com

Shirley Woodward, Esquire
shirley.woodward@wilmerhale.com

WILMER CUTLER PICKERING HALE AND DORR LLP

399 Park Avenue
New York, NY 10022
Tel: (212) 230-8800
Fax: (202) 663-6363

Counsel for HRH Prince Mohamed Al Faisal Al Saud

Matthew Previn, Esquire
matthew.previn@wilmerhale.com